

MCI WORLD COM

ORIGINAL

ORIGINAL

1801 Pennsylvania Avenue, NW
Washington, DC 20006

March 23, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

MAR 23 2000

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

CC Docket No. 98-170

Dear Ms. Salas:

On March 22, 2000, Meg Milroy (via telephone) and I of MCI WorldCom met with Dorothy Attwood, legal advisor to Chairman Kennard, to discuss clarification of the truth-in-billing rules. We discussed the issues described in the attached document, which was distributed at the meeting.

In accordance with section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), an original and three copies are being filed with your office.

Sincerely,


Lori Wright
Senior Manager, Regulatory Affairs

cc: Dorothy Attwood

No. of Copies rec'd 04
List A B C D E

Truth in Billing Reconsideration

CC Docket No. 98-170

MCI WorldCom, Inc.

March 2000

Truth in Billing Rules

- Bill organization
 - Name of each provider for each charge
 - “Clear and conspicuous” notice of new charge
 - New provider -- one who did not bill in the previous month; describe whether IXC or LEC
- Descriptions of charges
 - “Plain language” description
- Deniable/nondeniable identification
- Clear, conspicuous disclosure of inquiry contact information

In key respects, rules require
clarification and/or
modification...

Deniable/nondeniable

- FCC has overreached its jurisdiction, but if the Commission seeks to affirm this requirement
 - must clarify that it is LEC's responsibility to implement
 - IXCs have no contractual or legal right to deny local service for nonpayment of toll

New service provider notice

- Rule provides that “billing entity” must provide clear and conspicuous notice of any change in service provider
- Dispute has emerged about which entity has responsibility for triggering this notice
 - In case of LEC-billed long distance, LEC should:
 - Review PIC information stored in its switches to determine current IXC;
 - State on bill the PIC’d carrier as of a date certain; and
 - Take steps necessary to determine if the carrier is “new.”

New service provider notice

- FCC must clarify that non-presubscribed traffic (e.g., dial around) is specifically excluded from the notice requirement
 - There is no ongoing relationship between a dial around provider and a dial around user; a “per call” purchase decision